

## Safeguarding Risk Management Policy & Procedure

<b>Policy №:</b>	POL-OOD-010
<b>Applies to:</b>	OverOps Staff
<b>Sponsor:</b>	EVP/OverOps
<b>Created On:</b>	04/01/2024
<b>Approved Revision:</b>	01/01/2025
<b>Expiration or Review Date:</b>	01/01/2029

### **PURPOSE**

The purpose of this policy and procedure is to establish project-level Safeguarding risk management standards.

### **SCOPE**

All Country Programs and all projects<sup>1</sup>, irrespective of the funding source or instrument<sup>2</sup>, with an estimated budget of \$500,000 or more.<sup>3</sup>

### **POLICY**

All Country Programs and in-scope projects: **(I) are Assessed for Safeguarding Risks, (II) have a Safeguarding Risk Management Plan<sup>4</sup>, and (III) are Monitored for Compliance.**

### **PROCEDURE**

The Safeguarding Risk Management Procedure is a systematic, 3-phase process that aligns in-scope projects with the above Policy. The procedure's three phases, **I) Country-Level Risk Management, II) Project-Level Safeguarding Risk Management & Communications, and III) Compliance Management**, are described below including their specific procedural steps.<sup>5</sup>

This procedure is designed to mitigate administrative burdens, while also ensuring consistency and alignment with CRS Policies & Procedures and institutional donor requirements. Administrative burdens are mitigated via a multi-phased approach that identifies and addresses overarching safeguarding risks at the Country Program (CP) level and activity-specific risks at the Project-Level, while promoting comprehensive safeguarding risk management.

<sup>1</sup> A project is broadly defined as activities with clearly defined start/end dates and a budget undertaken to achieve a defined goal or objective for the direct benefit of a target population or communities.

<sup>2</sup> Includes contracts, grants, modifications, and commercial contracts funded by donors, private restricted and unrestricted/discretionary funding. For contract modifications with a duration of less than 6 months (including modifications that do not extend the implementation period), please contact the Global Safeguarding Team to determine if a PSRMP is necessary. Such a determination would be informed by the level of safeguarding risk and donor requirements. For projects without a Gateway opportunity record (e.g. projects exclusively funded by CRS), please contact the Global Safeguarding Team.

<sup>3</sup> CRS's Anti-Trafficking in Persons Compliance for USG Awards Procedure No. PRO-OOD-002 is not included in the scope of this policy and will need to be complied and filled out separately.

<sup>4</sup> Including a plan to communicate key safeguarding messages to project participants and communities.

<sup>5</sup> Multi-language support is available on the Ethics Unit's Safeguarding Resources SharePoint.

## I. PHASE 1 – COUNTRY-LEVEL RISK MANAGEMENT

This phase includes two steps to be completed by all Country Programs.<sup>6</sup> Step 1 details the process to complete a Country-Level Safeguarding Risk Management Plan (CSRMP), which involves identifying Safeguarding Risk Factors, corresponding risk mitigation measures, and individuals accountable for ensuring implementation of the risk mitigation measures. Step 2 details the review and approval process for the CSRMP.

### STEP 1: Develop A Country-Level Safeguarding Risk Management Plan (CSRMP)

Description:	<p><b>1.1 CSRMP - Development</b></p> <p>The Country Program must develop a CSRMP reflective of the context.</p> <p>A. Complete a CSRMP within the Safeguarding Risk Management Plan Power App (SRMP PowerApp) as follows:</p> <ol style="list-style-type: none"> <li>1) Open the CSRMP Tool<sup>7</sup> from the SRMP PowerApp,</li> <li>2) Review <u>each</u> Risk Factor and determine if it is present and applicable to the Country Program, using the means of verification described<sup>8</sup>,</li> <li>3) If the Risk Factor is present and applicable, review the illustrative mitigation measures and identify the mitigation measures most likely to remediate the risk<sup>9</sup>,</li> <li>4) Assign an individual accountable for ensuring each risk mitigation measure is implemented, and</li> <li>5) Enter the CSRMP into the SRMP PowerApp.<sup>10</sup></li> </ol>
Duration:	Q1, 14 working days. See Sub-step 6.2 for the annual review of CSRMP.
Responsible:	HoP in collaboration with the HoOps and the most senior safeguarding individual in the CP <sup>11</sup>
Accountable:	CR/CM

<sup>6</sup> If CRS does not have a presence in a country, only the Project-Level risk management process must be completed.

<sup>7</sup> Tool-Means of Verification is a document that will inform you of the information to collect and decisions to make when developing your Safeguarding Risk Management Plan, before entering it into the SRMP PowerApp.

<sup>8</sup> Country Programs and project teams are free to identify alternative means of verification. However, alternative sources of verification must be at least as rigorous as those suggested in the means of verification part of the Tool. Country Programs can gather the information using the most appropriate modality for the context. For example, this may be a series of key informant interviews or a workshop. The presence of Risk Factors should be determined on face value. That is - *Do those consulted have reason to believe that CRS staff, affiliates or associates subscribe to the views or practices listed in the Risk Factor?* There is no need to undertake additional information-gathering exercises beyond the suggested means of verification or equivalent. **If anyone consulted indicates that a Risk Factor is present, then YES must be selected.**

<sup>9</sup> A risk mitigation measure reduces the chance or impact of its associated Risk Factor. It is appropriate if it is clear, effective, and timely. Clear means well-defined, understood and communicated. Effective means it lowers the risk level or severity. Timely means it is done before the risk becomes a problem or worsens.

<sup>10</sup> JobAids available on the Ethics Unit's Safeguarding Resources SharePoint.

<sup>11</sup> The most senior safeguarding individual in the CP will vary based on the CP context. This may be a Manager, Advisor, Officer, or focal point.

<b>Consulted:</b>	CP Senior Management Team, CP Safeguarding Leads, selected frontline staff, Global Safeguarding Advisors, CP Human Resources staff, Humanitarian Response Department, GRC
<b>Informed:</b>	Relevant Global Safeguarding Advisor

## STEP 2: Review And Approval of the CSRMP

**Description:** The relevant Global Safeguarding Advisor must review the CSRMP's mitigation measures and CP leadership must approve the CSRMP in its entirety (presence of Risk Factors, mitigation measures, accountable assigned).

### **2.1 CSRMP – Global Safeguarding Advisor Review**

The relevant Global Safeguarding Advisor must review the information inputted into the SRMP PowerApp to assess<sup>12</sup> the appropriateness<sup>13</sup> of the mitigation measure associated with each identified Risk Factor, in accordance with the following process:

- A. Submit CSRMP to the Global Safeguarding Advisor for Review as follows:
- 1) The Country Program alerts the relevant Global Safeguarding Advisor that a CSRMP has been submitted for their review,
  - 2) If the Global Safeguarding Advisor deems the described mitigation method for a Risk Factor as:
    - a) appropriate, the Global Safeguarding Advisor approves the Risk Factor and submits the Risk Factor to the relevant Country Representative/Manager for final approval, skip to Step 2.3, or
    - b) inappropriate, they will record comments and suggestions<sup>14</sup> on how to improve the mitigation measures, proceed to Step 2.2.

### **2.2 CSRMP – Reappraisal of Rejected Mitigation Measures**

This step is only performed in instances where a Global Safeguarding Advisor recommends one or more mitigation measures are amended because they have been assessed as inappropriate, otherwise proceed to step 2.3.

- A. Reappraise the relevant mitigation measures as follows:

<sup>12</sup> Also reassess any mitigation measures that were rejected during initial Global Safeguarding Advisor review which have been resubmitted for review.

<sup>13</sup> A risk mitigation measure reduces the chance or impact of its associated Risk Factor. It is appropriate if it is clear, effective, and timely. Clear means well-defined, understood and communicated. Effective means it lowers the risk level or severity. Timely means it is done before the risk becomes a problem or worsens.

<sup>14</sup> The Global Safeguarding Team may provide additional guidance or suggestions regarding the mitigation measures detailed in the CSRMP and request that specific mitigation measures are updated to reflect the feedback provided. Ultimate decision-making responsibility will rest with the Country Representative/Country Manager responsible for approving the CSRMP.

- 1) Review the Global Safeguarding Advisors feedback and consider how best to incorporate it<sup>15</sup>,
- 2) Update the relevant mitigation measures within the SRMP PowerApp for the relevant Global Safeguarding Advisors final review, and
- 3) Inform the Global Safeguarding Advisor that the mitigation measures have been amended for their final review.

### **2.3 CSRMP - Approval**

The completed CSRMP must be reviewed by the HoP and HoOps, and approved by the CR/CM within the SRMP PowerApp.

### **2.4 CSRMP – Record Management**

An approved CSRMP is exported from the SRMP PowerApp and added to existing Country Program risk management review processes.

- 1) Locate the relevant approved CSRMP,
- 2) Click the Export button on the top right to export the CRSMP to Excel .csv format

<b>Duration:</b>	Within two working weeks of the CSRMP first being submitted to the Global Safeguarding Advisor.
<b>Responsible:</b>	HoP, HoOps Global Safeguarding Advisor
<b>Accountable:</b>	CR/CM
<b>Consulted:</b>	HRD, GRC
<b>Informed:</b>	Risk Owner, CR/CM

## **II. PHASE 2 – PROJECT-LEVEL RISK MANAGEMENT**

Phase 2 is performed during proposal design and mirrors the Country-Level phase of this Procedure in that it entails two comparable steps: Step 3, detailing the development of a Project-Level Safeguarding Risk Management Plan (PSRMP), which involves identifying Safeguarding Risk Factors, corresponding risk mitigation measures and individuals accountable for ensuring implementation of the risk mitigation measures<sup>16</sup> and Step 4, detailing the PSRMP review and approval process. Additionally, Step 5 outlines the process for creating a Safeguarding Communication Plan.

### **STEP 3: Develop a Project-Level Safeguarding Risk Management Plan (PSRMP)**

<b>Description:</b>	<b>3.1 PSRMP - Development</b>
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<sup>15</sup> A review of the written feedback may be complemented by a meeting to further discuss the feedback and effective mitigation strategies.

<sup>16</sup> JobAids available on the Ethics Unit's Safeguarding Resources SharePoint.

The PSRMP is developed during the proposal design phase<sup>17 18</sup>, in accordance with the process outlined below. Please refer to POL-OOD-010-A1 for guidance on how this process applies to global/multi-country grants.

A. Complete a PSRMP within the Safeguarding Risk Management Plan Power App (SRMP PowerApp) as follows:

- 1) Open the PSRMP Tool<sup>19</sup> from the SRMP PowerApp,
- 2) Review each Risk Factor and determine if it is present and applicable to the project<sup>20</sup>, using the means of verification method<sup>21</sup> described.
- 3) If the Risk Factor is present and applicable, review the illustrative mitigation measures and identify mitigation measures most likely to remediate the risk<sup>22</sup>,
- 4) Assign an individual accountable for ensuring each risk mitigation measure is implemented, and
- 5) Enter the PSRMP into the SRMP PowerApp.

<sup>17</sup> If CRS is a subrecipient to a grant where the prime recipient will receive \$500,000 or above, CRS should discuss and agree with the prime on how safeguarding risk management will occur. The primary options are:

- The prime takes the lead on the process, ensuring CRS has the required information to take the necessary actions to mitigate safeguarding risks; or
- CRS undertakes a risk assessment of the activities CRS will implement and develops a risk management plan accordingly.
- Irrespective of the approach adopted, the project team must ensure that the supporting evidence demonstrating that the safeguarding risk management plan has been developed is uploaded to the SRMP PowerApp. In instances where CRS is adopting the prime's risk management framework, the supporting evidence can be attached to risk factor one, with all other risks marked as not applicable.

<sup>18</sup> At the project level, activities to be undertaken by implementing partners must be considered when developing the risk management plan.

<sup>19</sup> Tool-Means of Verification is a document that will inform you of the information to collect and decisions to make when developing your Safeguarding Risk Management Plan, before entering it into the SRMP PowerApp.

<sup>20</sup> Proposal teams should assess the application of the Risk Factors in CRS' areas of operation ***including activities to be undertaken by implementing partners***. If the answer to the Risk Factor question varies between locations, select **YES** if applicable to **any** location.

<sup>21</sup> Proposal teams are free to identify alternative means of verification. However, alternative sources of verification must be at least as rigorous as those suggested in the means of verification column of the Tool. Proposal teams can gather the information using the most appropriate modality for the context. For example, this may be a series of key informant interviews or a workshop. The presence of Risk Factors should be determined on face value. That is, *do those consulted have reason to believe that CRS staff, affiliates or associates subscribe to the views or practices listed in the Risk Factor?* There is no need to undertake additional information gathering exercises beyond the suggested means of verification or equivalent. **If anyone consulted indicates that the Risk Factor is present, then YES must be selected.**

<sup>22</sup> A risk mitigation measure reduces the chance or impact of its associated Risk Factor. It is appropriate if it is clear, effective and timely. Clear means well-defined, understood and communicated. Effective means it lowers the risk level or severity. Timely means it is done before the risk becomes a problem or worsens.

<b>Duration:</b>	Due 14 days before submission <sup>23</sup>
<b>Responsible:</b>	Proposal Technical Design Lead and most senior safeguarding personnel in country of project implementation. <sup>24</sup>
<b>Accountable:</b>	Head of Programs (HoP)
<b>Consulted:</b>	Project Design Team, CP Human Resources, CP Partner Safeguarding Focal Point
<b>Informed:</b>	Global Safeguarding Advisor

#### STEP 4: REVIEW AND APPROVAL OF PSRMP

<b>Description:</b>	<p><b>4.1 PSRMP – Global Safeguarding Advisor Review</b></p> <p>The relevant Global Safeguarding Advisor must review the PSRMP’s mitigation measures, and the Head of Programs (HoP) must approve the PSRMP in its entirety (presence of Risk Factors, mitigation measures, responsible person assigned).</p> <p>A. Submit PSRMP for Global Safeguarding Advisor review as follows:</p> <ol style="list-style-type: none"><li>1) The Proposal Technical Design Lead alerts the relevant Global Safeguarding Advisor that a PSRMP has been submitted for their review,</li><li>2) If the Global Safeguarding Advisor deems the described mitigation method for a Risk Factor as:<ol style="list-style-type: none"><li>a) appropriate, the Global Safeguarding Advisor approves the Risk Factor and submits the Risk Factor to the relevant HoP for final approval, skip to Step 4.3, or</li><li>b) inappropriate, they will record comments and suggestions<sup>25</sup> on how to improve the mitigation measures, proceed to Step 4.2.</li></ol></li></ol> <p><b>4.2 PSRMP – Reappraisal of Rejected Mitigation Measures</b></p> <p>This step is only performed in instances where a Global Safeguarding Advisor recommends one or more mitigation measures be amended because they have been assessed as inappropriate (otherwise proceed to step 4.3).</p> <p>A. Reappraise the relevant mitigation measures.</p>
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<sup>23</sup> Except in instances where the time between the donor’s call for proposals and submission deadline prevents adherence to this deadline. In such cases, alert the relevant Global Safeguarding Advisor about the proposal development as soon as possible, and agree on a feasible review timeline.

<sup>24</sup> The most senior Safeguarding personnel in the CP will vary based on the CP context. This may be a Manager, Advisor, Officer or focal point.

<sup>25</sup> The Global Safeguarding Team may provide additional guidance or suggestions regarding the mitigation measures detailed in the PSRMP and request specific mitigation measures be updated to reflect the feedback provided. Ultimate decision-making responsibility will rest with the Head of Programs (HoP) responsible for approving the PSRMP.

- 1) Review the Global Safeguarding Advisor’s feedback and consider how best to incorporate it<sup>26</sup>,
- 2) Amend the mitigation measures within the SRMP PowerApp for final Global Safeguarding Advisors review, and
- 3) Inform the Global Safeguarding Advisor that the mitigation measures have been amended for their final review.

#### **4.3 PSRMP - Approval**

The completed PSRMP must be approved by the Head of Programs (HoP) within the SRMP PowerApp prior to moving to the next phase of this process.

#### **4.4 PSRMP – Record Management**

Once the project is approved, the PSRMP must be reflected in the Compass Project Risk Register.

- A. Export the approved PSRMP from SRMP Power App to a .csv file:
  - 1) Open the SRMP Power App,
  - 2) Locate the relevant approved PSRMP,
  - 3) Click the Export button on the top right to export the PRSMP to Excel .csv format
- B. Add the relevant risk mitigation measures to the Compass Project Risk Register<sup>27</sup> and assign responsible individuals, with an identified timeline for implementation and monitoring.

<b>Duration:</b>	Within one working week of the PSRMP first being submitted to the Global Safeguarding Advisor or in parallel to the regional review process, whichever occurs sooner.
<b>Responsible:</b>	Proposal Technical Design Lead and most senior safeguarding personnel in country of project implementation <sup>28</sup>
<b>Accountable:</b>	HoP
<b>Consulted:</b>	Proposal Design Team, CP Human Resources, CP Partner Safeguarding Focal Point
<b>Informed:</b>	Global Safeguarding Advisor

<sup>26</sup> A review of the written feedback may be complemented by a meeting to further discuss the feedback and effective mitigation strategies.

<sup>27</sup> Standard 7, Key Action 1.

<sup>28</sup> The most senior safeguarding personnel in the CP will vary based on the CP context. This may be a Manager, Advisor, Officer or focal point.

## STEP 5: Safeguarding Communications Plan (SCP)

<b>Description:</b>	<b>5.1 Implementing a Safeguarding Communications Plan<sup>29</sup></b> For every in-scope project, A SCP is required to document how the project will raise safeguarding awareness among the project participants.  A. Promote Safeguarding awareness by conveying key messages as follows: 1) Ensure CRS' key safeguarding messages are conveyed to project participants from day one of project implementation <sup>30</sup> . During the start-up phase of a project, consult project participants on their preferred method for receiving safeguarding messages, and the most effective language to convey CRS' 12 essential safeguarding messages. Project teams can then further contextualize CRS' templates or develop tailored images <sup>31</sup> . 2) The Country Program Safeguarding Advisor (if grade nine or above) or the Head of Programs (HoP) approve the completed Communicating with Communities Key Safeguarding Messages Reporting document (SCP) within six months of project commencement. 3) Upload the approved Communicating with Communities Key Safeguarding Messages Reporting document to the associated Gateway Project Record. a. Use the naming convention SCP_<ProjectName>.dotx, where: i. ProjectName: Replace with the Project Name of the corresponding Project Record in Gateway. <sup>32</sup>
<b>Duration:</b>	Initiated upon first contact with project participants and/or community members and persisting for the duration of activities. <sup>33</sup>
<b>Responsible:</b>	Project Leads (Project Manager, Program Manager, Chief of Party) or their designate
<b>Accountable:</b>	HoP or CP Safeguarding Advisor
<b>Consulted:</b>	Project participants

<sup>29</sup> Further Guidance can be found in the Communicating with Communities Guidance Overview Document and Toolkit.

<sup>30</sup> Where appropriate, the communication templates from CRS' Safeguarding Visual Toolkit can be used in the initial phase of project implementation, without adaptation.

<sup>31</sup> If project teams have developed safeguarding communication materials in the past, they may continue to use them if all of CRS' 12 essential Safeguarding messages included in the Safeguarding Visual Toolkit are reflected. While the communication methods, language, and images may differ based on context, teams cannot pick and choose which of the 12 essential Safeguarding messages to include. All 12 must be included. If there are sensitivities that would prevent a project team from conveying a particular message – teams should consult the relevant Global Safeguarding Advisor.

<sup>32</sup> Safeguarding Communication Plan ex. the filename for the FARARANO (DFAP) Project would be SCP\_\_FARARANO (DFAP).dotx.

<sup>33</sup> Communicating key safeguarding messages to communities must occur throughout project implementation, commencing on day one. The plan to inform communities members on an ongoing basis must be uploaded to the relevant Gateway Project Record within 6 months of project commencement.



Informed: | Relevant project teams

### III. PHASE 3 – COMPLIANCE MANAGEMENT

Phase 3 involves activities with iterative or extended durations which ensure that this Policy & Procedure is effective and aligned with CRS' goals and values. These steps include risk plan monitoring, auditing, reporting, training, and corrective actions.

The following procedural steps describe the activities that should be performed by different areas of the organization. However, these activities are not always required or sequential. They may vary depending on the context and the needs of each project.

#### STEP 6: Global Compliance Management

Description:

##### **6.1 Compliance Monitoring and Auditing**

As part of the Compliance Management process, the activities defined in this Policy are subject to Agreement Review Summary (ARS) sign off<sup>34</sup>, internal audit<sup>35</sup> and the Field Internal Control Questionnaire (ICQ) which includes control statements related to safeguarding risk management.

##### **6.2 Annual CRSMP Review**

Country Program leadership is accountable for keeping the CRSMP updated and relevant to the changing context and needs of the CP. On an annual basis, recommended in Q1 of the fiscal year, the CP must review, and update as needed, the Country-Level Safeguarding Risk Management Plan (CRSMP), but no later than the start of the Annual Program/Budget Planning process.

- A. Conduct an annual Review of CSRMP within the Safeguarding Risk Management Power App (SRMP PowerApp) by following Steps 1 and 2 of this Procedure.<sup>36</sup>

##### **6.3 ARS Controls**

ARS requests for Awards of \$500k or more must demonstrate compliance with this Policy & Procedure by ensuring that an approved PSRMP is reflected in the SRMP Power App. If the PSRMP documents are missing or outdated, the ARS request will not be approved.

##### **6.4 Notification Requirement**

Project Leads (Project Manager, Program Manager, Chief of Party) are accountable for ensuring that any safeguarding violation is reported in accordance with the CRS Policy on Safeguarding. This applies to any information from any source alleging that

<sup>34</sup> See Step 6.3.

<sup>35</sup> To ensure that CRS adheres to its policies, standards and regulations, and manages its risks effectively, this term encompasses different types of activities and functions including but not limited to formal audit conducted by the Internal Audit department, but also oversight and monitoring activities performed by the Global Safeguarding Advisor and/or GRC.

<sup>36</sup> RACI information, including responsible parties, is detailed in Steps 1 and 2.

	CRS or its subrecipient, or anyone who interacts with beneficiaries, has <sup>37</sup> exploited, abused, or neglected any person during the period of performance.
Duration:	Variable
Responsible:	Global Safeguarding Team, GRC, Internal Audit, Agreement Approvers <sup>38</sup>
Accountable:	Executive Vice President for Overseas Operations, Regional Directors, Country Representatives/Managers, Safeguarding Director, Global Risk and Compliance, Director of Internal Audits
Consulted:	DRDs/Ops, DRDs/PQ
Informed:	OOLT

## ADHERENCE

This Policy & Procedure is designed to ensure that Safeguarding Risks are managed effectively and consistently. Accountable Parties are expected to ensure adherence to this Policy & Procedure. Failure to do so may result in disciplinary action.

Deviations from this Policy & Procedure can only be approved by the Safeguarding Director in consultation with the OverOps Leadership for *non*-USAID proposal and/or awards. No deviations are allowed under any circumstances under USAID awards and/or proposals.

## INTERPRETATION AND QUESTIONS

Questions and interpretation related to this Policy & Procedure must be directed to the Service Desk.

**The contents of this Policy & Procedure are subject to the content and Disclaimer included in the CRS Policy on Policy Development, Review & Approval.**

## GLOSSARY

Term/Acronym	Definition/Compound Term
<b>SRMP PowerApp</b>	The Safeguarding Risk Management PowerApp is a Microsoft Power App owned by the Global Safeguarding Team. It is a resource that helps with safeguarding risk management by guiding users through the risk assessment process and allowing them to submit the resulting risk management plans for approval by the relevant authorities.
<b>CSRMP</b>	Country-Level Safeguarding Risk Management Plan
<b>HoP</b>	Head of Programs

<sup>37</sup> Includes supporting or ignoring the stated actions.

<sup>38</sup> As designated in the Agreement Process Map (No. POL-ODD-001-A2).

<b>PRSMF</b>	Project-Level Safeguarding Risk Management Plan
<b>Proposal Technical Design Lead</b>	Individuals tasked with designing project activities during a proposal development process.
<b>Risk Factor</b>	A Risk Factor is something that increases the likelihood or probability of a negative outcome, such as injury, abuse, exploitation, or reputational damage. In the context of Safeguarding, Risk Factors can be related to the individuals involved, the environment, the activities, or the policies and procedures. For example, if CRS staff have not been properly sensitized to Safeguarding policies, this may lead to issues such as lack of awareness, reporting, or prevention of potential harm or abuse.
<b>Risk Mitigation Measure</b>	Action that reduces the chance or impact of an associated Risk Factor. A mitigation measure must be clear, effective, and timely. Clear means well-defined, understood and communicated. Effective means it lowers the risk level or severity. Timely means it is done before the risk becomes a problem or worsens.
<b>Risk Owner</b>	Individual responsible for implementation of a risk management plan.
<b>Tool</b>	Guidance that will help with planning a risk assessment before the risk information is entered into the SRMP PowerApp.

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## RELATED RESOURCES

- ANNEX 1 - GUIDANCE ON APPLYING POL-OOD-010 TO GLOBAL/MULTI-COUNTRY GRANTS (№ POL-OOD-010-A1)
- [CRS Safeguarding Policy](#)
- [CRS Partner Safeguarding Policy & Procedure](#)
- [CRS Whistleblower and Non-Retaliation Policy](#)
- CRS Compass
- [USAID ADS 303maa \(M27\)](#)

# Safeguarding Risk Management Policy & Procedure

## ANNEX 1 - GUIDANCE ON APPLYING POL-OOD-010 TO GLOBAL/MULTI-COUNTRY GRANTS

### PURPOSE

This Annex to the Safeguarding Risk Management Policy & Procedure No. POL-OOD-010 (SRMPP), outlines the alternate procedure for Steps 3 and 4 of the SRMPP. This alternative procedure is specifically designed to address the unique challenges and requirements associated with global and multi-country grants.

### ALTERNATE (A) PROCEDURE – PSRMPS FOR MULTI COUNTRY AWARDS

#### STEP 3(A): DEVELOP A MULTI-COUNTRY PROJECT-LEVEL SAFEGUARDING RISK MANAGEMENT PLAN

Description: **3.1(A) PSRMP - Development**

The PSRMP is developed during the proposal design phase<sup>1</sup>, in accordance with the process outlined below.

- A) Complete a PSRMP within the Safeguarding Risk Management Plan Power App (SRMP PowerApp) as follows:
- 1) Open the PSRMP Tool<sup>2</sup> from the SRMP PowerApp, ensuring you select headquarters within both the Region and Country drop down menus and select multi-country from the Type drop down menu and select the relevant year from the FY drop down menu.
  - 2) The Proposal Technical Design Lead Reviews each Risk Factor and determines if it is present and applicable to the project, using the means of verification method<sup>3</sup> described. The risk

<sup>1</sup> If CRS is a subrecipient to a grant where the prime recipient will receive \$500,000 or above, CRS should discuss and agree with the prime on how Safeguarding risk management will occur. The primary options are:

- The prime takes the lead on the process, ensuring CRS has the required information to take the necessary actions to mitigate Safeguarding risks; or
- CRS undertakes a risk assessment of the activities CRS will implement and develops a risk management plan accordingly.
- Irrespective of the approach adopted, the project team must ensure that the supporting evidence demonstrating that Safeguarding risk management will occur, is uploaded to Gateway.

<sup>2</sup> Tool-Means of Verification is a document that will inform you of the information to collect and decisions to make when developing your Safeguarding Risk Management Plan, before entering it into the SRMP PowerApp.

<sup>3</sup> Country Programs and project teams are free to identify alternative means of verification. However, alternative sources of verification must be at least as rigorous as those suggested in the means of verification column of the Tool. Country Programs can gather the information using the most appropriate modality for the context. For example, this may be a series of key informant interviews or a workshop. The presence of Risk Factors should be determined on face value. That is, do those consulted have reason to believe that CRS staff, affiliates or associates subscribe to the views or practices listed in the Risk Factor? There is no need to undertake additional information gathering exercises beyond the suggested means of verification or equivalent. **If anyone consulted indicates that the Risk Factor is present, then YES must be selected.**

factor should remain in draft until all countries have considered if the risk factor is present. If the Risk Factor is present and applicable to any of the countries or implementation sites, select yes, the risk factor is present.

- 3) If the risk factor is present, the most senior safeguarding personnel in the countries of implementation reviews the illustrative mitigation measures and within the mitigation measure text box records mitigation measures most likely to remediate the risk<sup>4</sup>. The risk mitigation measures must be adapted to each context/country where the risk is present. Within the mitigation measure text box, record the country/context the risk is applicable to, and the role or individual accountable for ensuring the relevant risk mitigation measure is implemented in each applicable context/country.
- 4) List the Chief of Party or Project Director as the overall individual accountable for ensuring the risk mitigation measure is implemented across all relevant countries. If the Chief of Party or Project Director is yet to be appointed, list the Prospective Agreement Holder.
- 5) Submit each risk factor for approval.

Duration:	Due 14 days before proposal submission <sup>5</sup>
Responsible:	Proposal Technical Design Lead and most senior safeguarding personnel in countries of project implementation. <sup>6</sup>
Accountable:	PIQA led - Senior Technical Advisor – Program Quality (Global Awards Team) HRD led - Relevant Director/Manager or their designate

<sup>4</sup> A risk mitigation measure reduces the chance or impact of its associated Risk Factor. It is appropriate if it is clear, effective and timely.

- Clear means well-defined, understood and communicated.
- Effective means it lowers the risk level or severity.
- Timely means it is done before the risk becomes a problem or worsens.

If the countries of implementation are unknown, the mitigation measure/s most likely to address the risk based on what is known of the project at the time of developing the risk management plan, can be recorded.

<sup>5</sup> Except in instances where the time between the donor's call for proposals and submission deadline prevents adherence to this deadline. In such cases, alert the relevant Global Safeguarding Advisor about the proposal development as soon as possible, and agree on a feasible review timeline.

<sup>6</sup> The most senior Safeguarding personnel in the CP will vary based on the CP context. This may be a Manager, Advisor, Officer or focal point.

Consulted:	CP Human Resources, CP Partner Safeguarding Focal Point
Informed:	Global Senior Safeguarding Advisor

#### STEP 4(A): REVIEW AND APPROVAL OF PSRMP

Description:	<p><b>4.1(A) PSRMP – Global Senior Safeguarding Advisor Review</b> The Global Senior Safeguarding Advisor must review the PSRMP's mitigation measures.</p> <p>A) Submit the PSRMP for the Global Senior Safeguarding Advisor's review as follows:</p> <ol style="list-style-type: none"><li>1) The Proposal Technical Design Lead alerts the Global Senior Safeguarding Advisor that a PSRMP has been submitted for their review,</li><li>2) If the Global Senior Safeguarding Advisor deems the described mitigation method for a Risk Factor as:<ol style="list-style-type: none"><li>a) appropriate, the Risk Factor is approved, skip to Step 4.3, or</li><li>b) inappropriate, they will provide comments and suggestions<sup>7</sup> on how to improve the mitigation measures, proceed to Step 4.2.</li></ol></li></ol> <p><b>4.2(A) PSRMP – Reappraisal of Rejected Mitigation Measures</b> This step is only performed in instances where the Global Senior Safeguarding Advisor recommends one or more mitigation measures be amended because they have been assessed as inappropriate (otherwise proceed to step 4.3).</p> <p>A. Reappraise the relevant mitigation measures.</p> <ol style="list-style-type: none"><li>1) Review the Global Senior Safeguarding Advisor's feedback and consider how best to incorporate it<sup>8</sup>,</li><li>2) Amend the mitigation measures within the SRMP PowerApp, and</li><li>3) Inform the Global Senior Safeguarding Advisor that the mitigation measures have been amended for their final review.</li></ol>
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<sup>7</sup> The Global Senior Safeguarding Advisor may provide additional guidance or suggestions regarding the mitigation measures detailed in the PSRMP and request specific mitigation measures be updated to reflect the feedback provided. Ultimate decision-making responsibility will rest with the anticipated Agreement Holder for approving the PSRMP.

<sup>8</sup> A review of the written feedback may be complemented by a meeting to further discuss the feedback and effective mitigation strategies.

**4.3(A) PSRMP - Approval**

The relevant PIQA or HRD accountable party must approve the PSRMP in its entirety (presence of Risk Factors, mitigation measures, accountable person assigned to each mitigation measure) within the SRMP PowerApp, prior to moving to the next phase of this process.

**4.4(A) PSRMP – Record Management**

Once approved, the PSRMP must be reflected in the relevant Compass Project Risk Register.

- A. Add the relevant risk mitigation measures and responsible individuals to the Compass Project Risk Register<sup>9</sup> with an identified timeline for implementation and monitoring.

Duration:	Approval of the PSRMP must occur within one working week of the PSRMP first being submitted to the Global Senior Safeguarding Advisor or in parallel to the regional review process, whichever occurs sooner.
Responsible:	Proposal Design Technical Lead and Global Senior Safeguarding Advisor
Accountable:	Senior Technical Advisor – Program Quality (Global Awards Team) HRD led - Relevant Director/Manager or their designate
Consulted:	CP Human Resources, CP Partner Safeguarding Focal Point
Informed:	

**RELATED RESOURCES**

- Safeguarding Risk Management Policy & Procedure (POL-OOD-010)

<sup>9</sup> Standard 7, Key Action 1.